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7 *Attorneys for Debtors and Reorganized Debtors*

8 **UNITED STATES BANKRUPTCY COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**

11 **In re:**

12 **PG&E CORPORATION,**

13 **- and -**

14 **PACIFIC GAS AND ELECTRIC**  
15 **COMPANY,**

16 **Debtors.**

- 17 ☐ Affects PG&E Corporation  
18 ☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

19 *\* All papers shall be filed in the Lead Case, No.*  
20 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ROBB MCWILLIAMS  
IN SUPPORT OF REORGANIZED  
DEBTORS' ONE HUNDRED TWELFTH  
OMNIBUS OBJECTION TO CLAIMS  
(SATISFIED CLAIMS / NO LEGAL  
LIABILITY CLAIMS)**

**Response Deadline:**  
**December 7, 2021, 4:00 p.m. (PT)**

**Hearing Information If Timely Response Made:**

Date: December 21, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Robb C. McWilliams, pursuant to section 1746 of title 28 of the United States Code, hereby  
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,  
3 information, and belief:

4 1. I am a Managing Director at the firm of AlixPartners, LLP (“**AlixPartners**”), which is  
5 an affiliate of both AlixPartners, LLC and AP Services, LLC (“**APS**”). APS was previously retained to  
6 provide interim management services to Pacific Gas and Electric Corporation and Pacific Gas and  
7 Electric Company, as debtors and reorganized debtors (collectively, the “**Debtors**,” or, as reorganized  
8 pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned Chapter 11 cases (the  
9 “**Chapter 11 Cases**”). I submit this Declaration in support of the *Reorganized Debtors’ One Hundred*  
10 *Twelfth Omnibus Objection to Claims (Satisfied Claims / Legal No Liability Claims)* (the “**Omnibus**  
11 **Objection**”),<sup>1</sup> filed contemporaneously herewith. This Declaration relates only to the Satisfied Claim  
12 (as defined below).

13 2. In my current position, I am responsible for overseeing the Bankruptcy Case Management  
14 component of AlixPartners’ assignment to assist the Reorganized Debtors with various matters related  
15 to these Chapter 11 Cases. My area of responsibility includes the effort by AlixPartners, in coordination  
16 with the Reorganized Debtors, to review and assess the validity of all claims asserted against the Debtors,  
17 other than (a) Fire Claims and Subrogation Wildfire Claims and (b) providing limited support with  
18 respect to Securities Claims. I am generally familiar with the Reorganized Debtors’ day-to-day  
19 operations, financing arrangements, business affairs, and books and records. Except as otherwise  
20 indicated herein, all facts set forth in this Declaration are based upon my personal knowledge, the  
21 knowledge of other AlixPartners professionals working under and alongside me on this matter, my  
22 discussions with the Reorganized Debtors’ personnel, the Reorganized Debtors’ various other advisors  
23 and counsel, and my review of relevant documents and information prepared by the Reorganized  
24 Debtors. If called upon to testify, I would testify competently to the facts set forth in this Declaration. I  
25 am authorized to submit this declaration on behalf of the Reorganized Debtors.

26  
27 <sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in  
28 the Omnibus Objection.

1           3.       The AlixPartners team under my supervision has been actively and intimately involved  
2 in the claims review and reconciliation process since shortly after the filing of these Chapter 11 Cases.  
3 AlixPartners initially assisted the Debtors in the preparation of their bankruptcy schedules based on the  
4 Debtors' books and records. As claims were filed, AlixPartners coordinated with the Debtors the process  
5 of reconciling filed claims with the Debtors' schedules and books and records to determine the validity  
6 of filed claims based on those schedules and books and records. AlixPartners has developed and  
7 maintains a claims reconciliation database and various data management applications that are used by  
8 the Reorganized Debtors and AlixPartners to identify both valid claims as well as claims that are not  
9 valid in whole or in part and the appropriate grounds for objection to such claims. AlixPartners is now  
10 supporting, and will continue to support, the efforts of the Reorganized Debtors and their counsel to  
11 resolve disputed claims, including by formal objections as necessary.

12           4.       As part of the claims review and reconciliation process described in Paragraph 3 above,  
13 the AlixPartners team, working with the Reorganized Debtors' personnel and other professionals, has  
14 identified a number of filed claims that have been fully paid—and thus completely satisfied and  
15 released—prior to the commencement of or over the course of these Chapter 11 Cases. The Omnibus  
16 Objection is directed to one of those claims—that specifically identified in **Exhibit 1** to the Omnibus  
17 Objection, in the column headed "Claims To Be Disallowed and Expunged," and referred to in the  
18 Omnibus Objection as the "Satisfied Claim." **Exhibit 1** to the Omnibus Objection was prepared by the  
19 AlixPartners team under my overall supervision, and I am familiar with it, its contents, and the process  
20 under which it was prepared.

21           5.       **Exhibit 1** to the Omnibus Objection also identifies in the "Basis for Objection" that the  
22 Satisfied Claim is classified as a "Satisfied Claim," referring to Claims that have been satisfied prior to  
23 or during the pendency of these Chapter 11 Cases. This Proof of Claim (No. 79082) was asserted by  
24 Claimant ICF Jones & Stokes, Inc. It arises from sixty-nine invoices for post-petition services, totaling  
25 \$637,420.09. The Plan provides that such Administrative Expense Claims (as defined therein) are to be  
26 paid by the Reorganized Debtors in the ordinary course of business, consistent with past practice. Plan  
27 § 2.1. The invoices underlying the Satisfied Claim have in fact been paid in the ordinary course of  
28 business.

6. Based on AlixPartners' review of the Reorganized Debtors' books and records and my team's consultations with the Reorganized Debtors' personnel, the Satisfied Claim identified on **Exhibit 1** to the Omnibus Objection has been satisfied prior to or over the course of the Chapter 11 Cases. Accordingly, through the Omnibus Objection, the Reorganized Debtors request that the Court disallow and expunge the Satisfied Claim in its entirety.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief. Executed this tenth day of November, 2021.

/s/ Robb McWilliams  
Robb McWilliams